

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Expanding Flexible Use in Mid-Band Spectrum)	GN Docket No. 17-183
Between 3.7 and 24 GHz)	

COMMENTS OF VIASAT, INC.

ViaSat, Inc. submits these comments in response to the *Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz Notice of Inquiry* adopted by the Commission on August 8, 2017 (the “*NOI*”). The *NOI* initiates a proceeding that seeks comment on the feasibility of introducing new terrestrial wireless service in spectrum bands between 3.7 GHz and 24 GHz.¹ In addition to specific spectrum bands, the *NOI* seeks comment on “other potential opportunities for expanded flexible broadband use, on a licensed and unlicensed basis, particularly in non-federal and shared bands between 3.7 and 24 GHz.”

As the leading provider of satellite-based broadband services throughout the United States, ViaSat welcomes the opportunity to provide its perspectives with respect to the issues raised in the *NOI*. In particular, ViaSat welcomes the opportunity to update the Commission with respect to the company’s ongoing efforts to deploy high-quality satellite broadband solutions throughout the United States—including services currently achieving the 25/3 Mbps speed threshold and expected to provide 100-plus Mbps speeds following the entry into service of ViaSat-2 later this year. In addition, ViaSat recently has completed critical design review and is now commencing full construction of the first two ViaSat-3-class satellites that will provide over one terabit per second (1,000 Gbps) of throughput and burst in the 1 Gbps

¹ *Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz*, Notice of Inquiry, GN Docket No. 17-183 (rel. Aug. 3, 2017) (the “*NOI*”).

range.² The key to providing these high-speed satellite broadband services, just as with terrestrial wireless broadband, is access to sufficient spectrum.

The networks that ViaSat is deploying provide high-quality broadband by connecting consumers directly to high-quality fiber---delivering traffic directly to and from the end user and the satellite and to and from the satellite to a gateway earth station that connects directly to the Internet via high-quality fiber.³

The Commission should ensure that adequate spectrum is made available to satellite broadband networks to meet the demands of consumers. Currently, ViaSat uses over two gigahertz of spectrum for feeder links and user terminals in bands below 24 GHz, under consideration in the *NOI*. Specifically, ViaSat operates in most of the 17.7-20.2 GHz range. Any consideration by the Commission, however, of putting additional users in the bands, should take into account the extensive investment and heavy use that is already underway in the bands by licensed broadband service providers.

ViaSat has been expanding access to these bands over the years with Commission authority in order to meet the growing demand for satellite broadband services. ViaSat is investing in future networks, as described above, to continue that growth and expansion of capacity to meet the exponentially growing demand for satellite broadband services.

CONCLUSION

ViaSat urges the Commission to ensure that adequate spectrum is available for the next generation of satellite broadband networks. Through appropriate spectrum policies, the

² See, Press Release, dated Sept. 25, 2017, *ViaSat and Boeing Proceeding with Full Construction on the First Two ViaSat-3 Satellites* (<http://investors.viasat.com/releasedetail.cfm?ReleaseID=1041504>).

³ See generally Letter from ViaSat to FCC, WC Docket No. 10-90 (May 19, 2016).

Commission can make high-quality broadband service available to all Americans—no matter where they live or travel.

For the reasons provided above, ViaSat urges the Commission to fully consider satellite broadband deployment in any proposals that it may make in the *NOI* regarding the introduction of new services in the 17.7-20.2 GHz bands.

Respectfully submitted,

/s/

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